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21 | IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-CV-5944 JST
MDL No. 1917

This Document Relates To:

24 | Best Buy Co., Inc. et al. v. Hitachi, Ltd. et al., No.
3:11-cv-05513-JST

**STIPULATION AND [PROPOSED]
ORDER REGARDING NOTICE OF
SETTLEMENT AND EFFECT ON
PENDING MOTION FOR SUMMARY
JUDGMENT (DKT. 2973)**

Judge: Hon. Jon S. Tigar
Trial Date: None Set
Courtroom: 9, 19th Floor

1 Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc.,
2 Best Buy Stores, L.P., BestBuy.com, L.L.C. and Magnolia Hi-Fi, LLC (collectively, "Best Buy") and
3 Defendants Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.
4 (collectively, "Chunghwa"), by their respective attorneys, state as follows:

5 1. Best Buy commenced an action in the United States District Court for the Northern
6 District of California entitled *Best Buy Co., et al. v. Hitachi, Ltd., et al.*, Case No. 3:11-cv-05513,
7 alleging violations of federal and state antitrust law in connection with trade and commerce in
8 cathode ray tube products against Chunghwa and other defendants;

9 2. Best Buy and Chunghwa have entered into a comprehensive confidential written
10 settlement agreement and the parties expect to file stipulations of dismissal with prejudice within 30
11 days;

12 3. Chunghwa's pending Motion for Summary Judgment on Direct Action Plaintiffs'
13 State Law Claims on Due Process Grounds (MDL Dkt. No. 2973), currently scheduled for hearing on
14 March 28, 2016, remains pending as to only Best Buy and Chunghwa, and will be moot if, as
15 expected, Best Buy files a dismissal with prejudice as to Chunghwa;

16 4. Chunghwa and Best Buy therefore request that the hearing on that motion be taken off
17 calendar; and

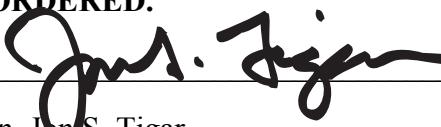
18 5. This stipulation does not affect the rights or claims of Best Buy against any other
19 defendant or alleged co-conspirator in this litigation.

20 WHEREFORE, Best Buy and Chunghwa stipulate and agree that the hearing on the summary
21 judgment motion brought by Chunghwa at MDL Dkt. No. 2973 should be taken off calendar and
22 need not be resolved by the Court at this time.

23 The undersigned parties jointly and respectfully request that the Court enter this stipulation as
24 an order.

25 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

26 Dated: March 21, 2016



Hon. Jon S. Tigar
United States District Judge

1 DATED: March 11, 2016

GIBSON, DUNN & CRUTCHER LLP

2 By: /s/ Joel S. Sanders
3 Joel S. Sanders

4 *Attorneys for Defendants*
5 *CHUNGHWA PICTURE TUBES, LTD and*
CHUNGHWA PICTURE TUBES (MALAYSIA) SDN.
BHD.

6 DATED: March 11, 2016

7 ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

8 By: /s/ Roman M. Silberfeld
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22 *SERVICES, INC.; BEST BUY STORES, L.P.;*
23 *BESTBUY.COM, L.L.C.; and MAGNOLIA HI-FI, LLC*

24 Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has
25 been obtained from each of the signatories.